

MODINE

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November 27, 2013

Ms. Christine Kump-Mitchell
Project Coordinator, Hazardous Waste Program
MDNR St. Louis Regional Office
7545 S. Lindbergh, Suite 210
St. Louis, MO 63216

Re: Modine Manufacturing Company – Camdenton, MO
Quarterly Report for period ending September 30, 2013
AOC No. 99-HW-002

Dear Ms. Kump-Mitchell:

The following is a summary report of the activities completed from July 1, 2013 through September 30, 2013 at the above referenced site. This report is being submitted as required by the Corrective Action Abatement Order on Consent, Order No. 99-HW-002 (AOC) paragraphs 91 through 94.

Description of work completed during the quarter:

Modine received a letter dated July 3, 2013 from the Missouri Department of Natural Resources (MDNR) which included additional comments on a redrafted Quality Assurance Project Plan (QAPP) for a two-season indoor air plus subslab sampling program. Modine responded to MDNR's July 3rd comments on August 9, 2013, and submitted a revised QAPP. MDNR completed its review of the revised QAPP, and on August 14, 2013 sent a letter to Modine which granted approval of the final QAPP dated August 7, 2013.

With MDNR's approval, Modine began its preparation for the summer subslab and indoor air sampling event. Two issues surfaced during that preparation. First, in coordinating the sampling event with the property's caretaker, it was learned that the property ownership was changing from RAAS Martin to Simmons First National Bank. On August 22, 2013, Mr. Thomas Meitner, Modine's EH&S Manager for the Americas Region, contacted Mr. Jim Jaklevic, Vice President at Simmons. Mr. Meitner reviewed the Camdenton facility site history and Modine's obligation to conduct subslab and interior air sampling with Mr. Jaklevic. Mr. Meitner provided Mr. Jaklevic the following documents:

- The Administrative Order on Consent (AOC) between Modine, the Missouri Department of Natural Resources (MDNR), and the Missouri Attorney General's Office.
- The Easement & Access Agreement, including an Environmental Covenant (in draft form) filed concurrently with the Camden County Register of Deeds in 2009.
- The Technical Memorandum prepared by Modine's consultant, CH2MHill, dated February 9 2013 which describes the proposed indoor air sampling program.

An Easement & Access Agreement between Modine and Simmons was executed August 27, 2013 thus allowing Modine access to the site to conduct the summer sampling event. CH2MHill coordinated its field staff, sampling supplies and outside laboratory services to conduct the sampling event planned for the week of September 9th. MDNR was contacted and concurred that this sampling event would be acceptable as a summer event given climate conditions during that period.

The second issue affecting sampling was identified during the start-up of the facility's Heating Ventilation and Air Conditioning (HVAC) system the week prior to September 9th. The HVAC system could not be

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properly operated due to instrumentation and controls issues. As a result of those issues, the HVAC system could not be operated correctly and indoor air conditions would not be representative of an occupied facility. The extent of those issues was beyond the capabilities of the caretaker for a near-term correction, and as such, Modine needed to cancel the sampling event. The HVAC controls remained inoperable at the end of this quarterly reporting period. Modine intends to coordinate with Simmons to jointly return the HVAC controls to an operational state. Once that is accomplished, and given the change in seasons, Modine will be preparing to conduct a winter sampling event in the coming months, followed by a summer sampling event in 2014.

Summary of findings, data, etc.:

No additional data was collected or submitted during this monitoring period.

Summary of problems or potential problems and any corrective measures implemented:

See the discussion in the above paragraphs related to the HVAC system controls.

Projected work for the next reporting period:

Modine intends to coordinate with Simmons to jointly return the HVAC controls to an operational state.

Instances of Non-compliance with the requirements of the Order:

There were no instances of non-compliance with the requirements of the Order during this reporting period.

The distribution of these quarterly reports is being changed to include the new owner, Simmons First National Bank, and to remove the former owner RAAS Martin and the associated lending institution Southwest Community Bank.

If you have any questions concerning this report, please contact Mr. Thomas Meitner, EH&S Manager at (262) 636-1412, or by email at t.e.meitner@modine.na.com.

Sincerely,



Jeffrey A. Decker
Director of Operations – North America

Cc: B. Aston - U.S. EPA – Region 7
S. Poplawski - Bryan Cave, LLP
M. Martin - CH2MHill
J. Jaklevic - Simmons First National Bank
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